

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

NOV - 5 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JANISE NICHOLE LAMPLEY,

Defendant.

No.

4:15CR500 JAR

INFORMATION

The United States Attorney charges that:

The Defendant

1. At all times relevant to this Indictment, defendant Janise Nichole Lampley was a resident of St. Louis, Missouri. Lampley was employed as personal care attendant for a home health care agency that maintained an office in St. Louis County, Missouri, all within the Eastern Division of the Eastern District of Missouri.

Background

The Missouri Medicaid Program

2. The Missouri Medicaid Program is a health care benefit program within the meaning of 18 U.S.C. § 24(b) that affects interstate commerce and provides low income citizens of Missouri with medical benefits, items, and services. Funded by federal and state tax revenue, the Missouri Department of Social Services administers the Missouri Medicaid Program under federal law, with guidance from the United States Department of Health and Human Services.

3. Under certain circumstances, the Missouri Medicaid program provides reimbursement for personal care services delivered to beneficiaries in the home setting. Personal

care services include meals, the cleaning and grooming of the beneficiary, medication management, and other services. The goal of personal care services is to enable the beneficiary to remain in the home setting with outpatient treatment instead of long term inpatient stays in hospitals and nursing homes.

4. All Medicaid providers, including personal care providers, must retain fiscal and medical records that fully document services billed to Medicaid for five years from the date of service, and must furnish or make the records available for inspection or audit by the Missouri Medicaid Program or its representative upon request. Failure to furnish, reveal, or retain adequate documentation for services billed to the Medicaid Program may result in recovery of the payments for those services not adequately documented and may result in sanctions to the provider's participation in the Medicaid Program.

5. For personal care services, the records required by the program include time sheets containing the name of the personal care attendant, the name of the beneficiary, the dates of service delivery, the time spent with the beneficiary, the daily care activities performed on each date, and the beneficiary's signature for each visit. Typically, Missouri Medicaid uses the amount of hours spent providing personal care services when calculating the amount of reimbursement to provide, making the accuracy of the records regarding which personal care services were performed over what time frame material to the program.

Counts 1-3

6. Paragraphs 1 through 5 are incorporated by reference, as if fully set forth herein.

7. On or about the dates indicated below, in St. Louis, Missouri, in the Eastern Division of the Eastern District of Missouri, and elsewhere,

JANISE NICHOLE LAMPLEY,

the defendant herein, knowingly and willfully made and used materially false writings and documents, knowing the same to contain materially false, fictitious, and fraudulent statements and entries, in connection with the delivery of and payment for health care benefits, items; and services involving the Missouri Medicaid program, a health care benefit program as defined in 18 U.S.C. § 24(b), in violation of 18 U.S.C. § 1035, in that the defendant falsely stated and represented in log sheets that she had furnished and provided personal care services to certain patients on or about certain dates for certain time frames, when the defendant then and there well knew said statements and representations were false, fictitious, and fraudulent.

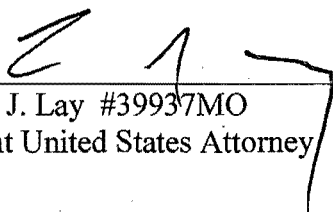
COUNT	DATE OF OFFENSE	PATIENT'S INITIALS	ACTUAL LOCATION OF DEFENDANT
1	February 26, 2013	W.C.	Taking bar examination in Jefferson City, MO
2	December 24, 2013	A.C.	Nail Salon in Atlanta, Georgia
3	April 26, 2014	A.C.	Casino in Las Vegas, Nevada

All in violation of Title 18, United States Code, Sections 1035(a)(2) and 2.

UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

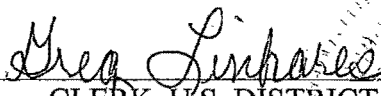
I, Andrew J. Lay, Assistant United States Attorney for the Eastern District of Missouri,
being duly sworn, do say that the foregoing information is true as I verily believe.

Richard G. Callahan
United States Attorney

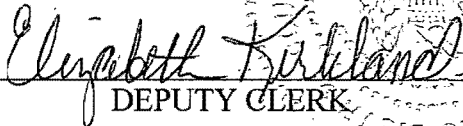


Andrew J. Lay #39937MO
Assistant United States Attorney

Subscribed and sworn to before me this 20 day of October, 2015.



CLERK, U.S. DISTRICT COURT

By: 

DEPUTY CLERK

